

EXHIBIT "B"

From: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>

Sent: Sunday, July 30, 2023 2:41 PM EDT

To: David, Daniel <Daniel.David@lewisbrisbois.com>; adam.swick@akerman.com <adam.swick@akerman.com>

CC: Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>; john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: RE: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

Dan – when is the ETA for the update to the complaint?

We are looking at it and need to know where you are – my last email from you said you would get this done this morning – now its afternoon.

Now, it's this evening?

I am sorry if you are going through some issues, but we need communication on exactly where you are so the rest of us can try and salvage this?

From: David, Daniel <Daniel.David@lewisbrisbois.com>

Sent: Sunday, July 30, 2023 1:44 PM

To: adam.swick@akerman.com

Cc: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>;

john.thompson@akerman.com; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

All, I'm sorry. I had no intention to cause a delay or be last minute. After our conference call on Friday morning, I was under the impression that filing was to happen later than tomorrow. I apologize for any position I have put anyone in and take responsibility for having unexpected personal emergencies happen this weekend.

Daniel David

Attorney

Houston

713.324.0107 or x7130107

From: adam.swick@akerman.com <adam.swick@akerman.com>

Sent: Sunday, July 30, 2023 12:39:53 PM

To: David, Daniel <Daniel.David@lewisbrisbois.com>

Cc: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>;

john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

□ This is ridiculous. Client wants if filed tomorrow. We maybe can hold until Tuesday but Dan you have really put everyone in a bad position. John, Ralph and whoever else from LB can attend let's look at the draft and determine next steps. Let's have a call at 2:00 eastern.

Sent from my iPhone

On Jul 30, 2023, at 11:25 AM, David, Daniel <Daniel.David@lewisbrisbois.com> wrote:

[External to Akerman]

I had it offline from imanage to separate that working draft from the previous drafts that were saved and named differently.

Daniel David

Attorney

Houston

713.324.0107 or x7130107

<Logo_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png>

Daniel David

Attorney

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From: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>
Sent: Sunday, July 30, 2023 11:23:57 AM
To: David, Daniel <Daniel.David@lewisbrisbois.com>; adam.swick@akerman.com <adam.swick@akerman.com>
Cc: Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>; john.thompson@akerman.com <john.thompson@akerman.com>;
Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>
Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

You said you would send it this morning.

You didn't save this to IManage?

Get [Outlook for iOS](#)

From: David, Daniel <Daniel.David@lewisbrisbois.com>
Sent: Sunday, July 30, 2023 12:22:14 PM
To: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>; adam.swick@akerman.com <adam.swick@akerman.com>
Cc: Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>; john.thompson@akerman.com <john.thompson@akerman.com>;
Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>
Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

I am not near my laptop right now. The update I can give you is I have included the Jane Doe, John Doe, investment bankers, and law firms references in the complaint. I need to finish plugging in the lender liability claim and applicable counts to that claim and connect facts which I will have this evening.

Daniel David
Attorney
Houston
713.324.0107 or x7130107

From: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>
Sent: Sunday, July 30, 2023 11:00:09 AM
To: adam.swick@akerman.com <adam.swick@akerman.com>; David, Daniel <Daniel.David@lewisbrisbois.com>
Cc: David, Daniel <Daniel.David@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>;
john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>
Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

I sent the most up to date I could find.

Dan - you need to get us the most recent version now.

You are holding up another firm, our firm, and the client.

It is now noon on the East Coast and I need you to respond and clearly explain where we are.

Rafael X. Zahralddin
302.545.2888
Sent from my iPhone

On Jul 30, 2023, at 11:28 AM, adam.swick@akerman.com wrote:

Please send the updated version.

Sent from my iPhone

On Jul 29, 2023, at 4:16 PM, Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com> wrote:

[External to Akerman]

That was all I could find - please try and get your updates circulated.

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<Logo_e6253148-26a1-47a9-b861-6ac0ff0bc3c4.png>

Rafael Zahralddin
Partner

Rafael.Zahralddin@lewisbrisbois.com

T: 302.985.6004 F: 302.985.6001 M: 302.545.2888

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From: David, Daniel <Daniel.David@lewisbrisbois.com>

Sent: Saturday, July 29, 2023 5:15:30 PM

To: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>

Cc: adam.swick@akerman.com <adam.swick@akerman.com>; john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits) (126091682.2).DOCX

I had a version I was working in and was making a separate one. If it doesn't have lender liability but I'd dated yesterday it was one I started in but not the most up to date.

Daniel David

Attorney

Houston

713.324.0107 or x7130107

From: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>

Sent: Saturday, July 29, 2023 4:14:03 PM

To: David, Daniel <Daniel.David@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>

Cc: adam.swick@akerman.com <adam.swick@akerman.com>; john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits) (126091682.2).DOCX

I will keep looking

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From: David, Daniel <Daniel.David@lewisbrisbois.com>

Sent: Saturday, July 29, 2023 5:12:46 PM

To: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>

Cc: adam.swick@akerman.com <adam.swick@akerman.com>; john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits) (126091682.2).DOCX

I am not at a computer or at home right now. I can send tonight when I am back home.

Daniel David

Attorney

Houston

713.324.0107 or x7130107

From: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>

Sent: Saturday, July 29, 2023 4:02:27 PM

To: David, Daniel <Daniel.David@lewisbrisbois.com>; Nguyen, Anh <Anh.Nguyen@lewisbrisbois.com>

Cc: adam.swick@akerman.com <adam.swick@akerman.com>; john.thompson@akerman.com <john.thompson@akerman.com>; Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>

Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complaint (DRAFT 7.26.2023) (akerman edits) (126091682.2).DOCX

Ok - I am in a new client - but who has already sent us our retainer and signed an agreement with an emergency next week- and I am looking through IManage for the complaint and can't find the latest version.

I see a version locked out by Anh.

I don't see this version saved in our system- so family engagement or not - I need you to send whatever you have done please right now.

Rafael X. Zahralddin
302.545.2888
Sent from my iPhone

On Jul 29, 2023, at 1:49 PM, Zahralddin, Rafael
<Rafael.Zahralddin@lewisbrisbois.com> wrote:

The issue is that the client was waiting for it. I understand family commitments but we need to communicate and coordinate with our client's and co-counsel's schedules as well.

Can you please given me an update on the following:

I was on site with another client yesterday and Adam said he was with a child at his doctors so I have no idea what the status is and which document is the most recent.

Did you work with JT as instructed and recommended? I think that was in order to deal with the structure/organization and your comment that you had some trouble combining the procedural and other fact sections?

Did you get in the new counts? The lender liability, John and Jane Does, and the trade secret issues?

Just need to understand where we are substantively.

The client, Mathu, said that Akerman was waiting for us to circulate a document to them. I want copies on any emails so I have a blind spot on that issue.

Can you just send the most recent version to Bud and Mathu to start reviewing and give them a definite time as to when the update will come to them?

That might help.

Bud has set our time to work on the document this weekend.

Rafael X. Zahralddin
302.545.2888
Sent from my iPhone

<Logo_e6253148-26a1-47a9-
b861-6ac0ff0bc3c4.png>

Rafael Zahralddin
Partner
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On Jul 29, 2023, at 1:32 PM, David, Daniel
<Daniel.David@lewisbrisbois.com> wrote:

I am finishing it up tomorrow morning and will send a revised version. I

have a family obligation I am at today.

Daniel David
Attorney
Houston
713.324.0107 or x7130107

From: Zahralddin, Rafael <Rafael.Zahralddin@lewisbrisbois.com>
Sent: Saturday, July 29, 2023 12:25:26 PM
To: adam.swick@akerman.com <adam.swick@akerman.com>
Cc: David, Daniel <Daniel.David@lewisbrisbois.com>;
john.thompson@akerman.com <john.thompson@akerman.com>;
Alexander, Vincent <Vincent.Alexander@lewisbrisbois.com>
Subject: Re: [EXT] 7.27.2023 REDLINE - Stream Complain (DRAFT 7.26.2023) (akerman edits)(126091682.2).DOCX

Is this supposed to be worked on by Daniel?

Is this supposed to go to client?

Rafael X. Zahralddin
302.545.2888
Sent from my iPhone

Rafael Zahralddin
Partner
Wilmington
302.985.6004 or x3026004

On Jul 28, 2023, at 10:36 AM, adam.swick@akerman.com
wrote:

Current draft

Adam Swick

Special Counsel

Akerman LLP | 500 West 5th Street, Suite 1210 | Austin, TX
78701

D: 737-999-7103

adam.swick@akerman.com

[Profile](#)

Akerman Logo



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